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10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 LINDSAY KAMAKAHI, an individual, on behalf
13 of herself and all others similarly situated,

14 Plaintiff,

15 vs.

16
17 AMERICAN SOCIETY FOR REPRODUCTIVE
18 MEDICINE; SOCIETY FOR ASSISTED
19 REPRODUCTIVE TECHNOLOGY; PACIFIC
FERTILITY CENTER,

20 Defendants.

Case No.

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

E-filing

21
22 Plaintiff Lindsay Kamakahi ("Plaintiff"), based upon personal knowledge, information, belief,
23 and the investigation of counsel, alleges as follows:

24 **NATURE OF THE ACTION**

25 1. This action challenges, as *per se* illegal under Section 1 of the Sherman Act, a horizontal
26 price fixing agreement among purchasers of human egg donor services ("Donor Services"). As
27 described more fully herein, Donor Services consist of the time, inconvenience, labor, and discomfort
28

1 incurred by women who agree to supply their own human eggs for assisted fertility and reproductive
2 procedures ("AR Eggs").

3 2. Specifically, in 2000, Defendant American Society for Reproductive Medicine
4 ("ASRM") promulgated certain rules setting forth the maximum compensation its members should pay
5 for Donor Services ("Maximum Price Rules"), and Defendant Society for Assisted Reproductive
6 Technology ("SART") adopted Maximum Price Rules.

7 3. SART-member fertility clinics ("SART Clinics") agreed amongst themselves to follow
8 the Maximum Price Rules, as did agencies serving such clinics. Their agreement constitutes a contract,
9 combination, and conspiracy in restraint of trade that is a *per se* violation of the Sherman Act.

10 4. This action is brought as a class action pursuant to Rule 23 of the Federal Rules of Civil
11 Procedure on behalf of a plaintiff Class, defined more fully below, consisting of all women who sold
12 Donor Services directly to a member of the Defendant Class (defined below) during the Class Period
13 defined below. ("Plaintiff Class").

14 5. This action is brought against defendants SART and ASRM. This action is also brought
15 against defendant Pacific Fertility Center, both in its individual capacity and as representative of a
16 Defendant Class, defined more fully below, consisting of all SART Clinics and all AR Egg agencies
17 (other than those who purchased Donor Services in Indiana) that were either signatories to an agreement
18 to abide by the Maximum Price Rules or otherwise agreed to adhere to such rules, and that paid for
19 Donor Services during the Class Period ("Defendant Class").

20 JURISDICTION AND VENUE

21 6. The Court has subject matter jurisdiction under 28 U.S.C. § 1331 (federal question) and
22 28 U.S.C. § 1337 (commerce and antitrust regulation), as this action arises under Section 1 of the
23 Sherman Act, 15 U.S.C. § 1, and Sections 4 and 16 of the Clayton Act, 15 U.S.C. §§ 15(a) and 26. The
24 Court also has jurisdiction over this matter pursuant to 28 U.S.C. § 1332(d), in that this is a class action
25 in which the matter or controversy exceeds the sum of \$5,000,000, exclusive of interest and costs, and in
26 which some members of the proposed class are citizens of a state different from the Defendants.
27
28

7. Venue is proper because Defendants reside, are found, have agents, and transact business in this District as provided in 28 U.S.C. § 1391(b) and (c) and in Sections 4 and 12 of the Clayton Act, 15 U.S.C. §§ 15 and 22.

8. The Court has personal jurisdiction over Defendants and because, *inter alia*, they: (a) transacted business throughout the United States, including in this District; (b) had substantial contacts with the United States, including in this District; and (c) were engaged in an illegal anticompetitive scheme that was directed at and had the intended effect of causing injury to persons residing in, located in, or doing business throughout the United States, including in this District.

PARTIES

9. Plaintiff Lindsay Kamakahi sold Donor Services in this District during the Class Period.

10. Defendant American Society for Reproductive Medicine ("ASRM") is an organization "devoted to advancing knowledge and expertise in reproductive medicine." ASRM membership is multidisciplinary and consists of medical professionals and corporations located throughout the United States. It has its headquarters at 1209 Montgomery Highway, Birmingham, Alabama 35216-2809 and has a public relations office in Washington, DC. It is incorporated in California. A central function of ASRM's Ethics Committee is the publication of "ethics reports" setting forth certain ethical standards for reproductive professionals, and a central function of ASRM's Practice Committee is to promulgate guidelines and standards to be followed by reproductive professionals

11. Defendant Society for Assisted Reproductive Technology ("SART") is an affiliated society to ASRM. It bills itself as the "primary organization of professionals dedicated to the practice of assisted reproductive technologies in the United States." According to its website, SART's members include over 392 practices, representing over 85% of the clinics engaged in the practice of assisted reproductive technologies in the United States. Its mission is "to set and to help maintain the standards for assisted reproductive technologies" including guidelines regarding ethical considerations, laboratory practice and proper advertising." It has its headquarters at 1209 Montgomery Highway, Birmingham, AL 35216-2809, which is the same address as the ASRM's headquarters.

12. Defendant Pacific Fertility Center is a SART-member Fertility Clinic located at 55 Francisco Street, Suite 500, San Francisco, CA 94133 that purchased Donor Services from Class Members (including the Plaintiff Class Representative) during the Class Period. It is being sued on its own behalf and as a class representative on behalf of the Defendant Class defined below.

CLASS ACTION ALLEGATIONS

Plaintiff Class

13. Plaintiff brings this action under Federal Rules of Civil Procedure 23(b)(2) and (b)(3) on her own behalf and on behalf of the following Plaintiff Class:

All women who, at any time during the time period starting four years prior to the filing date of this complaint to the present (the "Class Period"), sold Donor Services for the purpose of supplying AR Eggs to be used for reproductive purposes, within the United States and its territories, to any Defendant Class member (defined *infra*).

14. The Plaintiff Class is so numerous, and its members so geographically dispersed throughout the United States, that joinder of all Plaintiff Class members would be impracticable. While the exact number of Plaintiff Class members is unknown at this time, Plaintiff believes that there are, at least, thousands of members of the Plaintiff Class and that their identities are contained in Defendants' books and records.

15. Plaintiffs' claims are typical of the claims of the other members of the Plaintiff Class. Plaintiff and other members of the Plaintiff Class sold Donor Services at artificially low, non-competitive levels as a result of the actions of the Defendant Class and the restraint of trade alleged herein. Plaintiff and the members of the Plaintiff Class have all sustained damage compensable under federal antitrust law.

16. Plaintiff will fairly and adequately protect the interests of the members of the Plaintiff Class and has retained counsel competent and experienced in class action and antitrust litigation.

17. Defendants and the Defendant Class have acted or refused to act on grounds generally applicable to the Plaintiff Class, thereby making appropriate final injunctive relief or corresponding declaratory relief with respect to the Class as a whole.

1 18. Common questions of law and fact exist as to all members of the Plaintiff Class and
 2 predominate over any questions solely affecting individual members of the Plaintiff Class. Among the
 3 questions of law and fact common to the Plaintiff Class are:

- 4 a. Whether Defendants engaged in a contract, combination or conspiracy among themselves
 5 to fix, maintain, or stabilize the price of Donor Services purchased in the United States;
- 6 b. Whether the conduct of Defendants caused the prices of Donor Services to be artificially
 7 depressed;
- 8 c. Whether Defendants' conduct caused injury to the members of the Class and, if so, the
 9 proper measure of damages; and
- 10 d. Whether an injunction voiding the Maximum Price Rules should issue.

11 19. A class action is superior to other available methods for the fair and efficient adjudication
 12 of this controversy since joinder of all Plaintiff Class members is impracticable. The prosecution of
 13 separate actions by individual members of the Plaintiff Class would impose heavy burdens upon the
 14 courts and Defendants, and would create a risk of inconsistent or varying adjudications of the questions
 15 of law and fact common to the Plaintiff Class. A class action would achieve substantial economies of
 16 time, effort and expense, and would assure uniformity of decision as to persons similarly situated
 17 without sacrificing procedural fairness.

18 **Defendant Class**

19
 20 20. This action is brought under Federal Rules of Civil Procedure 23(b)(2) and (b)(3) against
 21 a Defendant Class consisting of:

22 All SART-member Fertility Clinics and all AR Egg Agencies that agreed to comply with
 23 SART/ASRM rules on donor egg compensation and who paid for Donor Services at any
 24 time during the time period starting four years prior to the filing date of this complaint to
 25 the present. Excluded from the Defendant Class are all SART-member Fertility Clinics
 26 and AR Egg Agencies located in the state of Indiana.

27 21. The Defendant Class representative is Pacific Fertility Center.
 28

1 22. The Defendant Class is so numerous, and its members so geographically dispersed, that
2 joinder of all members is impracticable. There are hundreds of members of the Defendant Class located
3 throughout the United States.

4 23. All Defendant Class members were engaged in an illegal anticompetitive scheme that
5 was directed at and had the intended effect of causing injury to persons residing in, located in, or doing
6 business throughout the United States, including in this District.

7 24. Each Defendant Class Member demonstrates its membership in the Defendant Class by
8 virtue of its membership in SART or, in the case of AR Egg Agencies, by agreeing to the Maximum
9 Price Rules.

10 25. Each Defendant Class Member is jointly and severally liable for the total damages caused
11 by the Defendant Class.

12 26. Pacific Fertility Center is typical of the Defendant Class. Pacific Fertility Center, and
13 members of the Defendant Class, paid for Donor Services at artificially low, non-competitive prices in
14 connection with the restraint of trade alleged herein. Pacific Fertility Center and members of the
15 Defendant Class have all benefitted in that they paid artificially low prices for Donor Services due to
16 Defendants' conduct in violation of federal law as complained of herein.

17 27. Pacific Fertility Center will fairly and adequately protect the interests of the members of
18 the Defendant Class.

19 28. Common questions of law and fact exist as to all members of the Defendant Class and
20 predominate over any questions solely affecting individual members of the Defendant Class. Among
21 the questions of law and fact common to the Defendant Class are:

- 22 a. Whether Defendant Class Members engaged in a contract, combination or conspiracy
23 among themselves to fix, maintain, or stabilize the price of Donor Services in the United
24 States;
25 b. Whether the conduct of Defendant Class Members caused the price of Donor Services to
26 be artificially depressed; and
27
28

- 1 c. Whether Defendant Class Members conduct caused injury to the members of the Plaintiff
2 Class and, if so, the proper measure of damages.

3 29. A class action is superior to other available methods for the fair and efficient adjudication
4 of this controversy since joinder of all Defendant Class members is impracticable. The prosecution of
5 separate actions against individual Defendant Class members would impose heavy burdens upon the
6 courts and Plaintiffs, and would create a risk of inconsistent or varying adjudications of the questions of
7 law and fact common to the Defendant Class. A class action would achieve substantial economies of
8 time, effort and expense, and would assure uniformity of decision as to persons similarly situated
9 without sacrificing procedural fairness.

10 **RELEVANT MARKET**

11 30. Defendants' Maximum Price Agreement is *per se* illegal and requires no allegations of
12 market definition.

13 31. Plaintiffs also allege, in the alternative, that the Maximum Price Agreement is
14 anticompetitive and illegal under the Rule of Reason.

15 32. For purposes of the Rule of Reason, the Relevant Product Market is the market for Donor
16 Services. The Defendant Class controls over 85% of the purchasing market for Donor Services.

17 33. The Relevant Geographic Market is the United States.

18 **INTERSTATE TRADE AND COMMERCE**

19 34. The business activities of Defendants that are subject of this action were within the flow
20 of, and substantially affected, interstate trade and commerce.

21 35. During the Class Period, Defendants transacted business in multiple states in a
22 continuous and uninterrupted flow of interstate commerce throughout the United States.

23 **FACTS**

24 **Assisted Reproductive Eggs in the United States**

25 **Background**

26 36. AR Eggs (also known as "oocytes") are a necessary component of human reproduction.
27 There is no available substitute.
28

1 37. While most AR Eggs are naturally produced by women who become pregnant, some are
2 provided by females who provide Donor Services (“AR Egg Providers”) by undergoing an extensive
3 screening process and an administered cycle of hormones to medically induce ovulation.

4 38. AR Eggs acquired from AR Egg Providers are used to enable women whose ovaries do
5 not produce enough healthy eggs to become pregnant.

6 39. AR Egg Providers go through a thorough screening and testing process before becoming
7 eligible to provide their eggs.

8 40. The screening process requires potential AR Egg Providers to first compile and disclose a
9 detailed medical and psychological history about themselves and their close blood relatives, including
10 questions about their use of cigarettes, alcohol, and both prescription and illegal drugs.

11 41. AR Egg Providers are also required to have a physical examination, including a pelvic
12 exam. As a part of this exam, AR Egg Providers are screened for infectious diseases, including
13 gonorrhea, chlamydia, syphilis, hepatitis B and C, HTLV-1, and HIV. AR Egg Providers are also
14 screened for inherited diseases and undergo psychological screening.

15 42. In the event the potential AR Egg Provider passes the screening process, the AR Egg
16 Provider must then go through the egg donation process.

17 43. This requires the AR Egg Provider to receive a three-week course of painful hormone
18 injections, aimed at stimulating egg production. During this period, the donor cannot have unprotected
19 sex, smoke, or drink alcohol, and must receive permission to take any other drugs.

20 44. While receiving hormone treatment, AR Egg Providers must also receive frequent blood
21 tests and ultrasound examinations to track the developing eggs and to monitor reaction to the hormones,
22 thereby requiring frequent doctor visits.

23 45. Short-term side effects during treatment include mood swings, fluid retention, and
24 enlarged ovaries. Occasionally, AR Egg Providers suffer serious side effects.

25 46. When the eggs are ready for retrieval, they are removed from the AR Egg Provider’s
26 ovaries in a surgical procedure called *transvaginal ovarian aspiration*. Following the procedure, the AR
27 Egg Provider may require several days of restricted activity to recover.
28

The Donor Services Market

47. Persons seeking to acquire AR Eggs do so through one of four means:

- a. Through an individual donating for the benefit of a close friend or family member;
- b. Through a full-service fertility clinic's ("Fertility Clinic") paid-provider recruitment program;
- c. Through an egg-donor agency ("AR Egg Agency") that recruits through a paid provider program; or
- d. Through a paid egg donor recruited directly by the person seeking to acquire the AR Eggs, either independently or through a broker, agent, or other intermediary.

48. Since it is difficult (and frequently impossible) for an individual seeking AR Eggs to find a desirable person willing to provide Donor Services for no compensation, the majority of AR Eggs are acquired from women who are compensated for their services.

49. Such payment is necessary to provide incentive for AR Egg Providers to go through the arduous process of providing AR Eggs. Most Fertility Clinics and AR Egg Agencies actively recruit AR Egg Providers with the promise of compensation for their Donor Services, including the time, effort, discomfort, and health risks resulting from the medical procedures involved.

50. The Donor Services market involves sales of approximately \$80 million annually.

Fertility Clinics and AR Egg Agencies Agree to Follow SART and ASRM Rules

51. The Donor Services market is largely self-regulated. There are no federal laws or regulations governing economic compensation for Donor Services. Plaintiff is aware of only two states with laws governing compensation for Donor Services: Louisiana, which bars such payments, and Indiana, which provides for a statutory cap on such payments.

52. Assisted reproductive technology professionals agree to abide by ethical and professional standards promulgated by ASRM's Ethics Committee and ASRM's Practice Committee. Indeed, all SART-member clinics must agree to abide by these standards as a condition of membership. One commentator has noted this agreement "is intended to discourage any possible governmental legislation that would encumber the free practice US doctors now enjoy."

53. SART, ASRM, and their member clinics openly admit that they have agreed to comply with ASRM's rules. For example, a September 25, 2009 press release issued by ASRM noted that clinics who wish to become members of SART are "required to" agree to "[a]dhere to all standards and recommendations of the ASRM Practice Committee" and to "[a]dhere to all standards and recommendations of the ASRM Ethics Committee."

54. Similarly, a "frequently asked questions" page on SART's web site notes that "SART members must agree to . . . abide by all practice, laboratory, ethical, and advertising guidelines" as part of SART's "rigorous requirements for membership." These practice and ethical "guidelines" include the Maximum Price Rules.

55. Moreover, SART sent a letter to certain AR Egg Agencies in February 2006 noting that Fertility Clinics must "comply with . . . ASRM and SART guidelines as a requirement of SART membership."

56. SART-member clinics comprise approximately 85% of the assisted reproductive clinics in the United States. One observer has noted that "[a]lmost uniformly, the major, mainstream IVF clinics are SART members and therefore 'SART compliant.'"

The Illegal Agreement

Background

57. ASRM has long been concerned about the prices paid AR Egg Providers for AR Eggs used for reproductive purposes, and have promulgated ethical guidelines concerning such payments since at least 1994.

58. Prior to 2000, ASRM's standards of practice merely stated that compensation for AR Donor Services "should not be so excessive as to constitute undue inducement" but neither organization had quantified a maximum (or indeed any) specific price.

ASRM Promulgates an Artificially Low Fixed Price for Donor Services

59. In 2000, ASRM, SART, and its members determined it would formally suppress the price paid to AR Egg Providers for Donor Services.

1 60. Thus, in 2000, ASRM's Ethics Committee promulgated a report entitled "Financial
2 Incentives in Recruitment of AR Egg Providers." ("2000 Maximum Price Report").

3 61. The 2000 Maximum Price Report specifically set forth the Maximum Price Rules, which
4 reflect what ASRM believes Fertility Clinics and AR Egg Agencies should pay for Donor Services.
5 That Report stated "at this time sums of \$5000 or more require justification and sums above \$10,000 go
6 beyond what is appropriate."

7 62. The rates set forth in the Maximum Price Rules were originally keyed to the market rates
8 for sperm donation, i.e. by taking the average price a sperm donor receives for a donation, computing an
9 hourly rate based on that price, and then multiplying that hourly rate by the number of hours it takes for
10 an egg donor to donate eggs. That number was then purportedly slightly adjusted upwards to account
11 for the additional inconveniences of Donor Services.

12 63. However, one commentator recently noted that Egg Donors receive an "average hourly
13 compensation of between roughly \$75 and \$93 for time spent in a medical setting, *about the same as*
14 *hourly sperm donor rates.*" (emphasis added).

15 64. In 2007, ASRM reaffirmed the \$5000 and \$10,000 Maximum Price Rules in a report
16 entitled "Financial Compensation of Oocyte Donors." ("2007 Maximum Price Report").

17 65. The rates called for by the Maximum Price Rules have never increased in the ten years
18 since they were initially promulgated.

19 66. ASRM's Practice Committee has repeatedly issued rules requiring compliance with the
20 Maximum Price Rules.

21 67. For example, the ASRM Report entitled "2002 Guidelines for gamete and embryo
22 donation" specifically noted that "[c]ompensation to the donor should be in compliance with the"
23 maximum prices set forth in the 2000 Maximum Price Report.

24 68. Similarly, ASRM's "2006 Guidelines for gamete and embryo donation" noted that
25 "[c]ompensation to [AR Egg Providers] should be in compliance with the ASRM Ethics Committee
26 report on the subject."
27
28

69. ASRM's "2008 Guidelines for gamete and embryo donation" made an identical observation, i.e. that "[c]ompensation to [AR Egg Providers] should be in compliance with the ASRM Ethics Committee report on the subject."

SART Member Fertility Clinics Agreed to the Fixed Price

70. As previously mentioned, SART-member Fertility Clinics agree to "[a]dhere to all standards and recommendations" of ASRM's Practice and Ethics Committees as a requirement of their membership in SART.

71. Consistent with this obligation, SART-member Fertility Clinics agreed to abide by the Maximum Price Rules.

72. This agreement was memorialized in, *inter alia*, a 2006 letter from SART indicating that its members were required to agree to the Maximum Price Rules.

73. A survey of approximately 375 websites of SART-member clinics found that of those that mentioned the price for donor services, all of them were at or under \$10,000.

74. Moreover, certain SART-member Fertility Clinics and AR Egg Agencies admit their agreement to the Maximum Price Rules on their websites.

75. For example, Defendant Pacific Fertility Center's web site noted during the Class Period that "[b]ecause of [its] continued efforts to practice medicine within guidelines set forth by ASRM and SART, egg donors participating in our program will NOT be paid above \$10,000 per cycle."

AR Egg Agencies Serving SART Member Fertility Clinics Agreed to the Fixed Price

76. As some SART-member Fertility Clinics procure AR Eggs from AR Egg Agencies, AR Egg Agencies serving SART-member Fertility Clinics have also agreed to comply with the Maximum Price Rules.

77. In May 2005, SART sent a letter to independent AR Egg Agencies informing them that all AR Egg Agencies serving SART-member clinics were expected to agree to comply with the Maximum Price Rules, and requesting those agencies sign an agreement to abide by those rules and inform the SART-member clinics with whom they worked of their agreement. In exchange, AR Egg Agencies signing the agreement would be listed on SART's web site, and their names would be

1 provided to two national infertility organizations (RESOLVE and the American Fertility Organization)
2 to provide information to patients seeking guidance in their efforts to locate AR Egg Agencies.

3 78. Many AR Egg Agencies did so.

4 79. In February 2006, SART sent a second letter to AR Egg Agencies. This letter first noted
5 that SART clinics agreed to comply with the Maximum Price Rules as a requirement of SART
6 membership. It then noted that the names of AR Egg Agencies who had signed the agreement to
7 comply with the Maximum Price Rules had been posted on SART's website and again requested the AR
8 Egg Agencies sign such an agreement. The letter also noted that a failure to comply with the Maximum
9 Price Rules would result in removal of their agencies from the list of SART-approved donor programs.
10

11 80. In March 2011 ASRM's web site contained a document listing the names and addresses
12 of all AR Egg Agencies that had signed an agreement to comply with the Maximum Price Rules. It is
13 attached hereto as Attachment A and contains the following text:

14 The egg donor agencies listed below have signed an agreement with the Society for
15 Assisted Reproductive Technology (SART) that they do and will abide by the American
16 Society for Reproductive Medicine (ASRM) Ethics and Practice committees' guidelines
17 governing . . . *financial compensation of oocyte donors*.

18 (emphasis added)

19 81. In March 2011, SART's web site contained a similar list, attached hereto as
20 Attachment B and prefaced by text reading:

21 The egg donor agencies listed below have signed an agreement with the Society for
22 Assisted Reproductive Technology (SART) that they do and will abide by the American
23 Society for Reproductive Medicine (ASRM) Ethics and Practice committees' guidelines
24 governing . . . *financial compensation of oocyte donors*.

25 (emphasis added).

26 82. AR Egg Agencies acknowledge this agreement.

27 83. For example, AR Egg Agency and Defendant Class Member ConceiveAbilities, Inc.
28 noted on its web site that "ConceiveAbilities strictly adheres to the guidelines as established by the

1 American Society for Reproductive Medicine (asrm.org) which state egg donor compensation more than
2 \$10,000 is unethical. Simply stated, a reputable agency will adhere to the guidelines and those that
3 don't should be viewed with extreme skepticism."

4 84. AR Egg Agency and Defendant Class Member Tiny Treasures, LLC's web site noted that
5 it "adheres to ASRM guidelines" and that "[c]ompensation requests may not exceed \$10,000 per the
6 guidelines set forth by the American Society for Reproductive Medicine."

7 85. AR Egg Agency and Defendant Class Member Conceptual Options' web site noted that
8 "[w]e abide by all ASRM and SART guidelines . . . A single donor will not be paid more than \$5000
9 without written justification and payments of \$10,000 or more are not appropriate."

10 86. AR Egg Agency and Defendant Class Member The Donor Source noted on its web site
11 that it "is compliant with all regulations and standards set forth by the American Society for
12 Reproductive Medicine," which would necessarily include the Maximum Price Rules.

13 87. AR Egg Agency and Defendant Class Member The Stork Society's web site noted "[t]he
14 ASRM guideline states that, 'Total payments to donors in excess of \$5,000 require justification and
15 sums above \$10,000 are not appropriate.' Donors will NOT be paid over \$10,000 under any
16 circumstance."

17 88. AR Egg Agency and Defendant Class Member Beverly Hills Egg Donation's web site
18 noted "in compliance with ASRM/SART Guidelines, donor fees start at \$6500, but will never be more
19 than \$9500."

20 89. AR Egg Agency and Defendant Class Member Peas in a Pod, Inc. noted on its web site
21 that "[o]ur agency prides itself in adhering to the ASRM's guidelines."

22 90. The web site of San Diego Fertility Center's AR Egg Agency and Defendant Class
23 Member (Egg Donor for You) notes that "[e]gg donor[s] are paid compensation based on American
24 Society of Reproductive Medicine guidelines."

25 91. AR Egg Agency and Defendant Class Member A Perfect Match's web site notes that
26 "[w]e abide by all ASRM and SART guidelines regarding financial compensation of oocyte donors."
27
28

1 92. AR Egg Agency and Defendant Class Member Circle Surrogacy notes that it “complies
2 with ASRM guidelines for egg donation compensation.”

3 93. AR Egg Agency and Defendant Class Member Heartfelt Egg Donation’s web site states it
4 “has signed an agreement with the Society for Assisted Reproductive Technology (SART) that states
5 that we will abide by the American Society for Reproductive Medicine (ASRM) Ethics Committee
6 Guidelines governing the payment of egg donors. The guidelines pertaining to appropriate donor
7 compensation specifically state: ‘Total payments to donors in excess of \$5,000 require justification and
8 sums above \$10,000 are not appropriate.’ Donors will not be compensated over \$10,000 under any
9 circumstance”

10 94. AR Egg Agency and Defendant Class Member Asian Egg Donation LLC’s web site
11 states its “suggested compensation for Donors is \$6000-\$8000. Compensation requests may not exceed
12 \$10,000 per the guidelines set forth by the American Society for Reproductive Medicine (ASRM).”

13 95. AR Egg Agency and Defendant Class Member Fertility Resources of Houston LLC’s
14 web site states that it “has agreed to be responsible for providing services in accordance with,” among
15 other things, the Minimum Price Rules.

16 96. AR Egg Agency and Defendant Class Member Prime Genetics, LLC’s web site states
17 that it “strictly complies with ASRM guidelines on Egg Donor compensation. Most Egg Donors are
18 compensated \$5000 for their time, inconvenience, discomfort and other related services. ASRM
19 guidelines require justification for compensation paid in excess of \$5000 and prohibits compensation
20 over \$10,000 under any circumstance.”

21 97. AR Egg Agency and Defendant Class Member Heartfelt Egg Donation’s web site notes
22 that it “has signed an agreement with the Society for Assisted Reproductive Technology (SART) that
23 states that we will abide by the American Society for Reproductive Medicine (ASRM) Ethics
24 Committee Guidelines governing the payment of egg donors.”

25
26 //

27
28 //

Fertility Clinics and AR Egg Agencies' Compliance with the Maximum Price Agreement Has Suppressed the Price of Donor Services

98. SART-member Fertility Clinics and AR Egg Agencies serving SART-member clinics have successfully suppressed the price of Donor Services to prices within the range set by the Maximum Price Rules.

99. Indeed, a 2007 survey performed for SART reported that SART-member Fertility Clinics paid an average of \$4,217 for AR Eggs per donor cycle, while AR Egg Agencies serving SART-member Fertility Clinics paid an average of \$5,200 per donor cycle.

100. An article recounting the results of that survey was published in the journal Fertility and Sterility. That article noted "the vast majority of clinics" are following the Maximum Price Rules.

101. Defendant Class Members' agreement to comply with the Maximum Price Rules violates the antitrust laws. Indeed, one commentator has made the following observation:

This naked price-fixing of egg donor compensation is so unusual in the modern U.S. regulatory environment of unrestrained competition that the most intriguing question it raises is not whether it violates the Sherman Act—under existing precedent it does. Rather, the relevant question is how, given the government's substantial enforcement resources and the presence of an active and entrepreneurial plaintiffs' bar, this buyers' cartel has managed to survive unchallenged since at least 2000.

ANTITRUST INJURY

102. During the Class Period, Plaintiff and the members of the Plaintiff Class sold Donor Services to Defendant Class members in the United States.

103. Plaintiff and members of the Class have suffered injury of the type that the antitrust laws are designed to punish and prevent. The price-fixing agreement eliminated price competition among SART member clinics in the procurement of Donor Eggs, a necessary component in the provision of AR Services.

104. By collectively agreeing to maintain artificially low supply prices for Donor Eggs, Defendant Clinics have been able to reap anti-competitive profits for themselves. Plaintiff and the

1 members of the Egg Donor Class have been injured by the absence of a competitive market for the
 2 supply of Donor Eggs because they have been paid less for Donor Services than they would have been
 3 paid absent the Maximum Price Rules. Plaintiffs and the members of the Class were injured and
 4 financially damaged in their businesses and property, in amounts that are not presently determined. As
 5 the direct victims of Defendants' antitrust violations, Plaintiffs are efficient enforcers of the antitrust
 6 claims made herein.

7 105. As set forth above, the average hourly rate Egg Donors receive for Donor Services is
 8 approximately the same as the hourly rate received by sperm donors. Since the process of donating eggs
 9 is far more painful and risky than is the process for donating sperm, a price paid for Donor Services that
 10 does not account for those difference must be artificially low.

11 COUNT ONE

12 **SHERMAN ACT SECTION ONE (15 U.S.C. § 1)**

13 **Maximum Price Fixing**

14 106. Plaintiffs reallege each allegation set forth above, as if fully set forth herein.

15 107. Defendants have entered into a *per se* maximum price fixing agreement, in violation of
 16 Section 1 of the Sherman Antitrust Act, 15 U.S.C. § 1.
 17

18 108. In the alternative, if evaluated under the Rule of Reason, the Maximum Price Agreement
 19 is an unreasonable restraint of trade in violation of Section 1 of the Sherman Antitrust Act, 15 U.S.C. §
 20 1.

21 109. In formulating and effectuating the Maximum Price Agreement, Defendants engaged in
 22 anti-competitive activities, the purpose and effect of which were to artificially suppress the price paid to
 23 Class Members for Donor Services. These activities include the following:

- 24 a. agreeing to pay certain prices for Donor Services and otherwise fix, raise, maintain,
 25 and/or stabilize the prices of Donor Services; and
- 26 b. paying certain prices for Donor Services, thereby fixing the price of Donor Services at
 27 the agreed-upon rates.

28 110. The illegal combination and conspiracy alleged had the following effects, among others:

- a. price competition in the pricing for the purchase of Donor Services for reproductive uses and, consequently, the price of such purchases has been restrained, suppressed, or eliminated;
- b. prices paid by Defendants for Donor Services for reproductive purposes has been fixed, raised, maintained, and/or stabilized at artificially low, non-competitive levels by the fixing of prices of Donor Services;
- c. payments received by Class Members for Donor Services for reproductive purposes has been fixed, raised, maintained, and/or stabilized at artificially low, non-competitive levels by the fixing of prices of Donor Services; and
- d. Class Members have been deprived of the benefit of free and open competition.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that:

- A. The Court certify the Plaintiff Class and appoint Plaintiff as Plaintiff Class Representative.
- B. The Court certify the Defendant Class and appoint Defendant Pacific Fertility Center as Defendant Class Representative.
- C. Defendants be adjudged to violate Section 1 of the Sherman Antitrust Act, 15 U.S.C. § 1.
- D. The Court declare the Maximum Price Rules to be unlawful and null and void.
- E. Judgment be entered for Plaintiff and members of the Plaintiff Class against Defendants and the Defendant Class for three times the amount of damages sustained by Plaintiff and the Plaintiff Class, together with the costs of the action, including reasonable attorneys' fees, and such other relief as is appropriate.
- F. Defendants, their affiliates, successors, transferees, assignees, and the officers, directors, partners, agents and employees thereof, and all other persons acting or claiming to act on their behalf, be permanently enjoined and restrained from, in any manner, continuing, maintaining, or renewing the contract, combination, or conspiracy alleged herein, or from engaging in any other contract, combination, or conspiracy having similar purpose or

1 effect, and from adopting or following and practice, plan, program, or device having a
2 similar purpose or effect.

3 G. Plaintiffs and the members of the Plaintiff Class have such other, further, and different
4 relief as the case may require and the Court may deem just and proper under the
5 circumstances.

6 DATED: April 12, 2011

FINKELSTEIN THOMPSON LLP

7
8 By: Rosemary M. Rivas
9 Rosemary M. Rivas

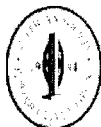
10 Mark Punzalan
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12 San Francisco, California 94104
13 Telephone: (415) 398-8700
14 Facsimile: (415) 398-8704

15 Douglas G. Thompson
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18 mmclellan@finkelsteinthompson.com
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1050 30th Street NW
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Telephone: 202-337-8000
Facsimile: 202-337-8090

20 Bryan Clobes
21 bclobes@caffertyfaucher.com
22 Ellen Meriweather
23 emeriweather@caffertyfaucher.com
24 **CAFFERTY FAUCHER LLP**
1717 Arch Street, Suite 3610
Philadelphia, PA 19103
Telephone: 215-864-2800
Facsimile: 215-864-2810

25
26 Counsel for Individual and Representative
27 Plaintiff Lindsay Kamakahi
28

ATTACHMENT A



AMERICAN SOCIETY FOR REPRODUCTIVE MEDICINE

Egg Donor Agencies

The egg donor agencies listed below have signed an agreement with the Society for Assisted Reproductive Technology (SART) that they do and will abide by the American Society for Reproductive Medicine (ASRM) Ethics and Practice committees' guidelines governing repetitive oocyte donation, financial compensation of oocyte donors, 2008 Guidelines for Gamete and Embryo Donation, as well as all HIPAA and all applicable federal and state laws on gamete donation for donors. Each of the egg donor agencies listed below has paid a small registration fee to SART to be listed. SART has reviewed the contents of the external websites listed below.

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[Michigan](#) | [Minnesota](#) | [Nevada](#) | [New Jersey](#) | [New York](#) | [North Carolina](#) | [Ohio](#) | [Oregon](#) |
[Pennsylvania](#) | [Puerto Rico](#) | [Tennessee](#) | [Texas](#) | [Utah](#) | [Washington](#)

Arizona

Precious Wonders
 2155 East Conference Drive
 Suite 115
 Tempe AZ 85284
 480/889-1209 480/897-1283
ejacox@ftcivf.com
www.preciouswonders.com

Colorado

An Eggceptional Match, LLC
 PO Box 1646
 Castle Rock CO 80104
 720/733-0184 720/733-0184
info@donatedeggs.com
www.donated-eggs.com

ConceiveAbilities, Inc.
 5445 DTC Parkway, Penthouse 4
 Greenwood Village CO 80111
 303/486-6868 303/398-7001

New York

Rite Options
 1225 Franklin Avenue, Suite 325
 Garden City NY 11530
 516/512-8888 516/626-6246
info@riteoptions.com
www.riteoptions.com

MyDonor.net
 24 East 12th Street, Suite A-F
 New York NY 10003
 212/691-6600

ASRM Patient Resources: Egg Donor Agencies

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California**Egg Donation Inc.**

15821 Ventura Boulevard
Suite 675
Encino, CA 91436
818/385-0950 818/385-0951
kiara@eggdonor.com
www.eggdonor.com

F Williams Donor Egg Services

PO Box 16577
Beverly Hills CA 90209
323/293-5500 323/293-5500
fwilliams@fwdonoreggs.com
www.fwdonoreggs.com

Beverly Hills Egg Donation

468 N Camden Dr., #200
Beverly Hills CA 90210
310/601-3132 310/694-9063
donorinfo@bhed.com
www.bhed.com

B Coming

9595 Wilshire Blvd #900
Beverly Hills Ca, 90212
310/247-0616 310/247-0059
info@b-coming.com
www.b-coming.com

Peas in a Pod, Inc.

P.O. Box 696
Glendora, CA 91741
818/314-3737
annamarie@peasinapodinc.com
www.peasinapodinc.com

info@conceiveabilities.com
www.conceiveabilities.com

Florida**A Jewish Blessing, LLC**

12480 Hatton Chase Lane East
Jacksonville, FL 32258
866/383-3829 904/2629794
jewishbaby1@yahoo.com
www.ajewishblessing.com

Eggceptional Donor Group

401 East Las Olas Blvd, Ste 130-238
Fort Lauderdale FL 33301
954/294-6961 954/587-2027
jennifer@eggceptionaldonors.com
www.eggceptionaldonors.com

Bundles of Joy LLC

3389 Sheridan Street, #424
Hollywood FL 33021
954/987-5802 954/332-2466
svogel@bundlesofjoyllc.com
www.bundlesofjoyllc.com

Our Fairy Godmother, LLC

5625 Strand Blvd, Suite 501
Naples FL 34110
877/240-4351 941/870-4308
info@ourfairygoddmother.com
www.ourfairygoddmother.com

Loving Donation

1331 S International Parkway
Suite 2291
Lake Mary FL 32746

info@mydonor.net
www.mydonor.net

Donor Services

106 West 96th Street, #4B
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212/665-5559
donorservices@aol.com
www.donorservicesofny.com

Tiny Treasures Agency, LLC

1230 Avenue of the Americas, 7th Fl.
New York, New York 10020
917/677-9090 / 888/512-5885
newyork@tinytreasuresagency.com
www.tinytreasuresagency.com

North Carolina**Baby Steps Egg Donation and Egg Surrogate Agency**

P.O. Box 731
Selma, NC 27576
919/965-3621 919/965-4177
jenny@babystepping.com
www.babystepping.com

Ohio**Compassionate Beginnings LLC**

PO Box 25
Terrace Park OH 45174
800/417-8835 513/965-0734
info@conceivablebeginnings.com
www.conceivablebeginnings.com

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Irvine, CA 92612

949/ 872-2800 877/385-0487

<http://www.TheDonorSOURCE.com>

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3190 Old Tunnel Road

Lafayette CA 94549

925/945-1880 925/933-6807

info@lodm.com

www.lodm.com

The Genesis Group

9025 Wilshire Boulevard, Suite 215

Beverly Hills CA 90212

310/550-6889 310/978-7666

info@genesiseqqdonation.com

www.genesiseqqdonation.com

The Center for Egg Options

840 Apollo Avenue, Suite 218

El Segundo, CA 90245

310/546-6786

ceo@eggoption.com

www.eggoption.com

Creative Conception, Inc

23832 Rockfield Boulevard, Ste 255

Lake Forest CA 92630

949/597-3191 949/597-3199

ccinceggs@aol.com

www.creativeconception.net

The Donor Egg Bank, Inc

1127 Wilshire Boulevard, Ste 1414

Los Angeles CA 90017

407/682-6604

lauria@lovingdonation.com

www.LovingDonation.com

Open Arms Consultants

3412 Clark Road, Suite 100

Sarasota FL 34231

941/741-4994 941/744-1942

www.openarmsconsultants.com

Idaho**Nationwide Egg Donation**

PO Box 533

Meridian ID 83680

208/895-8667 208/895-8072

tiffany@nationwideeggdonation.com

www.nationwideeggdonation.com

Giving Hope Egg Donation

2000 E Kamay Drive

Meridian, ID 83646

208/884-0455 208/445-1000

katy@givinghopellc.com

www.givinghopellc.com

Illinois**Alternative Reproductive Resources**

2000 North Racine, Suite 2182

Chicago IL 60614

773/327-7315 773/327-0334

arrinfo@arr1.com

www.arr1.com

Family Source Consultants LLC

1000 Essington Road

Reproductive Assistance, Inc.

PO Box 404

Terrace Park OH 45174

513/831-9207

lhenkel@zoomtown.com

www.reproductiveassistanceinc.com

Oklahoma**The Stork Society**

5030 North May Ave., #222

Oklahoma City, OK 73112

858/705-0398 608/770-6738

mary.bird@thestorksociety.com

www.thestorksociety.com

Oregon**Creating New Generations**

PO Box 1318

Coos Bay OR 97420

541/266-8284 541/267-8467

andrea@creatingnewgenerations.com

www.creatingnewgenerations.com

Pennsylvania**Seeds Center**

PO Box 670, Spring Hill Village

Hamlin PA 18427

800/733-1673 570/689-5170

info@seedscenter.com

www.seedscenter.com

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310/406-5350 310/868-2933
info@donoreggbankinc.com
www.donoreggbankinc.com

Egg Donor Conceptions, Inc.

1246 Armacost Ave., #402
 Los Angeles, CA 90025
 310/295-8021 888/872-8105
marissa@eggdonorconceptions.com
www.eggdonorconceptions.com

Growing Generations

5757 Wilshire Boulevard, Suite 601
 Los Angeles CA 90036
 323/965-7500 323/965-0900
family@growinggenerations.com
www.growinggenerations.com

L.A. Baby Donor Agency

11500 Olympic Boulevard, Suite 400
 Los Angeles CA 90064
 310/312-4561 310/312-4562
contact@lababy.us
www.lababy.us

Fertility Connections

90 Throckmorton Ave, Ste 24
 Mill Valley, CA 94941
 415/383-2553 415/383-2503
info@fertilityconnections.com
www.fertilityconnections.com

Golden Egg Donation

7494 Santa Monica Blvd. Suite 202 West Hollywood, CA 90046
 818/635-5141
goldeneggdonation@gmail.com
www.goldeneggdonation.com

Joliet IL 60435
 815/725-7474 815/828-5215
zara@familysourcesurrogacy.com
www.familysourcesurrogacy.com

ConceiveAbilities

2835 N Sheffield Avenue, Suite 304
 Chicago IL 60657
 773/868-3971 773/868-3972
info@conceiveabilities.com
www.conceiveabilities.com

Fertility Bridges

875 North Michigan Avenue, 31st Floor
 Chicago, Illinois 60611
 Phone: 312-794-7857
 Fax: 312-380-4603
 Krystal Lemcke
Krystal@FertilityBridges.com
www.FertilityBridges.com

Happy Beginnings LLC

1000 Main Street, Suite 3
 Mt Vernon IL 62864
 815/839-1101 904/212-1595
jennifer@happybeginningseggdonation.com
www.happybeginningseggdonation.com

Kansas**Egg Donor Creations**

13737 Horton Drive
 Overland Park, KS 66223
kelli@eggdonorcreations.com
www.eggdonorcreations.com

Tennessee**National Embryo Donation Center**

116 Concord Road, Suite 400
 Farragut, TN 37934
 866/585-8549
jkeen@embryodonation.org
www.embryodonation.org

Texas**Egg Donation Center of Dallas, Inc.**

1720 Avenue K
 Plano, TX 75074
 972/424-9369 972/516-1161
info@eggdonorcenter.com
www.eggdonorcenter.com

Fertility Resources of Houston

2450 Fondren, #302
 Houston TX 77063
 281/357-4010 281/357-5663
wendy@fertilityresourceshouston.com
www.fertilityresourceshouston.com

The Donor Solution

12727 Kimberly Lane, Suite 204
 Houston TX 77024
 713/827-0301
mary@thedonorsolution.com
www.thedonorsolution.com

Prime Genetics LLC

3525 Town Center Blvd South
 Sugar Land TX 77479
 281/265-1403 281/499-8966

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Elite Fertility Solutions

1280 Bison, B9- #550
 Newport Beach CA 92660
 949/494-6511 949/494-7910
sheryl@elitefertility.com
www.elitefertility.com

Miracles for Families, Inc.

1380 Lead Hill Blvd, Ste 106
 Roseville CA 95661
 916/899-0136 916/313-3294
info@miraclesforfamilies.com
www.miraclesforfamilies.com

Egg Donor For You

11515 El Camino Real, Ste 100
 San Diego, CA 92130
 858/794-6363
 Fax 858/794-6360
info@eggdonor4u.com
www.eggdonor4u.com

The Stork Society

11956 Bernardo Plaza Dr., #231
 San Diego, CA 92128
 858/705-0398 608/770-6738
mary.bird@thestorksociety.com
www.thestorksociety.com

Pacific Fertility Egg Donor Agency

55 Francisco Street, #500
 San Francisco CA 94133
 415/834-3000 415/834-3099
ryan@pacificfertility.com
www.infertilitydoctor.com

Extraordinary Conceptions

1225 San Elijo Road

Massachusetts**Northeast Assisted Fertility Group, Inc.**

92 State Street, 7th Floor
 Boston MA 02109
 800/710-1677 617/557-4301
inquiry@assistedfertility.com

Circle Surrogacy

80 Black Falcon Avenue
 Boston MA 02210
 617/439-4990 617/439-3987
john@circlesurrogacy.com
www.circlesurrogacy.com

Tiny Treasures LLC

35 Corporate Drive, 4th Floor
 Burlington MA 01803
 781/279-1325 781/279-1326
newengland@tinytreasuresagency.com
www.tinytreasuresagency.com

Choices Donations Inc

48 Taunton Street
 Lakeville, MA 02347
 508/946-4802
gina@choicesdonations.com
www.choicesdonations.com

Prospective Families

396 Washington Street, No. 216
 Wellesley, MA 02481
 781/235-0205
amy.demma@prospectivefamilies.com
www.prospectivefamilies.com

staciegetgood@primgen.net

www.prime-genetics.com

Utah**Utah Center for Reproductive Medicine**

675 Arapen Drive
 Suite 205
 Salt Lake City, Utah 84108
 801-581-3834/801-587-3475
fertilitydr@hsc.utah.edu
www.healthcare.utah.edu/ucrm

Reproductive Care Center

10150 South Petunia Way
 Sandy UT 84092
 801/878-8888 801/878-8890
donoreggcoordinator@fertilitydr.com
www.fertilitydr.com

Washington**Northwest Fertility Connection**

2212 Queen Anne Ave N #504
 Seattle WA 98109
 206/285-4855 206/285-0864
nwfertility@msn.com
www.NWFertility.com

Egg Donor Select, Inc.

11821 NE 128th Street
 Suite E
 Kirkland, WA 98034
 425/223-6902 866/ 598-0280

ASRM Patient Resources: Egg Donor Agencies

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San Marcos CA 92078
760/798-2265 760/798-4255
stephanie@extraconceptions.com
www.extraconceptions.com

Ova the Rainbow
PO Box 187
Stevenson CA 95374
209/669-8556 775/307-9948
ovatherainbow@cheerful.com
www.ovatherainbow.com

The Egg Donor Program
4184 Colfax Avenue
Studio City CA 91604
818/506-9300 818/506-9763
SSmithMFCC@eggdonation.com
www.eggdonation.com

American International Egg Donation
PO Box 2864
Suisun CA 94585
707/410-8396 707/864-8936
christine@aieggdonation.com
www.aieggdonation.com

Family Fertility Center
2977 Ignacio Valley Road, Box 617
Walnut Creek CA 94598
925/977-4850 925/977-4854
webmail@surromother.com
www.surromother.com

Family Creations LLC
22554 Ventura Blvd, Suite 203
Woodland Hills CA 91364
818/225-1700 818/225-0199
sgoldman@familycreations.net
www.familycreations.net

Maryland

Creative Family Connections, LLC
2 Wisconsin Circle, Suite 700
Chevy Chase MD 20815
240/235-6006 240/235-4555
info@creativefamilyconnections.com
www.creativefamilyconnections.com

Michigan

The Stork Society
2232 S. Main #201
Ann Arbor, MI 48103
858/705-0398 608/770-6738
marv.bird@thestorksociety.com
www.thestorksociety.com

The Egg Donor Program of Michigan
5090 State Street, Suite 103B
Saginaw MI 48603
989/791-9712 989/752-4558
mitziheine1@aol.com

Minnesota

International Assisted Reproduction Center
14788 77th Place North
Maple Grove MN 55311
888/671-6700 763/420-9588
info@iarc-usa.com
www.fertilityhelp.com

julie@eggdonorselect.com
www.eggdonorselect.com

Wisconsin

The Stork Society
1360 Regent St. #112
Madison, WI 53715
858/705-0398 608/770-6738
marv.bird@thestorksociety.com
www.thestorksociety.com

Tiny Treasures Agency, LLC

450 North Brand Blvd, Ste 600
Glendale, CA 91203

818/279-2690 888/512-5885

california@tinytreasuresagency.com

www.tinytreasuresagency.com

Conceptual Options

13025 Danielson Street
Suite 200

Poway, CA 92064

858/748-4222 858/748-4244

john@conceptualoptions.com

www.conceptualoptions.com

A Perfect Match

8419 La Mesa Blvd. Suite B

La Mesa, CA 91942

800-264-8828

Darlene@aperfectmatch.com

www.aperfectmatch.com

Woman to Woman Fertility Center, Inc.

383 Diablo Rd. #102

Danville, CA 94526

925/820-9495

wwfc@compuserve.com

www.womantowomanfertilitycenter.com

Nevada

Heartfelt Egg Donation LLC

1344 Disc Drive, Suite 402

Sparks NV 89436

866/223-0003 775/354-0533

info@heartfelteggdonation.com

www.heartfelteggdonation.com

New Jersey

Asian Egg Donation LLC

31 Cortland Drive

East Brunswick, NJ 08816

732/238-2138 732/238-8970

contact@asianeggdonation.com

www.asianeggdonation.com

ATTACHMENT B



AMERICAN SOCIETY FOR REPRODUCTIVE MEDICINE

Egg Donor Agencies

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[Pennsylvania](#) | [Puerto Rico](#) | [Tennessee](#) | [Texas](#) | [Utah](#) | [Washington](#)

Arizona

Precious Wonders
2155 East Conference Drive
Suite 115
Tempe AZ 85284
480/889-1209 480/897-1283
ejacox@ftcivf.com
www.preciouswonders.com

Colorado

An Eggceptional Match, LLC
PO Box 1646
Castle Rock CO 80104
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info@donatedeggs.com
www.donated-eggs.com
ConceiveAbilities, Inc.
5445 DTC Parkway, Penthouse 4
Greenwood Village CO 80111
303/486-6868 303/398-7001

New York

Rite Options
1225 Franklin Avenue, Suite 325
Garden City NY 11530
516/512-8888 516/626-6246
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www.riteoptions.com
MyDonor.net
24 East 12th Street, Suite A-F
New York NY 10003
212/691-6600

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kiara@eggdonor.com
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F Williams Donor Egg Services

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Beverly Hills CA 90209
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fwilliams@fwdonoreggs.com
www.fwdonoreggs.com

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donorinfo@bhed.com
www.bhed.com

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Beverly Hills Ca, 90212
310/247-0616 310/247-0059
info@b-coming.com
www.b-coming.com

Peas in a Pod, Inc.

P.O. Box 696
Glendora, CA 91741
818/314-3737
annamarie@peasinapodinc.com
www.peasinapodinc.com

info@conceiveabilities.com
www.conceiveabilities.com

Florida**A Jewish Blessing, LLC**

12480 Hatton Chase Lane East
Jacksonville, FL 32258
866/383-3829 904/2629794
jeewishbaby1@yahoo.com
www.aiewishblessing.com

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401 East Las Olas Blvd, Ste 130-238
Fort Lauderdale FL 33301
954/294-6961 954/587-2027
jennifer@eggceptionaldonors.com
www.eggceptionaldonors.com

Bundles of Joy LLC

3389 Sheridan Street, #424
Hollywood FL 33021
954/987-5802 954/332-2466
svogel@bundlesofjoyllc.com
www.bundlesofjoyllc.com

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5625 Strand Blvd, Suite 501
Naples FL 34110
877/240-4351 941/870-4308
info@ourfairygodmother.com
www.ourfairygodmother.com

Loving Donation

1331 S International Parkway
Suite 2291
Lake Mary FL 32746

info@mydonor.net
www.mydonor.net

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donorservices@aol.com
www.donorservicesofny.com

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1230 Avenue of the Americas, 7th Fl.
New York, New York 10020
917/677-9090 / 888/512-5885
newyork@tinytreasuresagency.com
www.tinytreasuresagency.com

North Carolina**Baby Steps Egg Donation and Egg Surrogate Agency**

P.O. Box 731
Selma, NC 27576
919/965-3621 919/965-4177
jenny@babystepping.com
www.babystepping.com

Ohio**Compassionate Beginnings LLC**

PO Box 25
Terrace Park OH 45174
800/417-8835 513/965-0734
info@conceivablebeginnings.com
www.conceivablebeginnings.com

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949/ 872-2800 877/385-0487

<http://www.TheDonorSOURCE.com>

Attorney Diane Michelsen

3190 Old Tunnel Road
Lafayette CA 94549
925/945-1880 925/933-6807

info@lodm.com

www.lodm.com

The Genesis Group

9025 Wilshire Boulevard, Suite 215
Beverly Hills CA 90212
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info@genesiseggdonation.com

www.genesiseeggdonation.com

The Center for Egg Options

840 Apollo Avenue, Suite 218
El Segundo, CA 90245
310/546-6786

ceo@eggoption.com

www.eggoption.com

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Lake Forest CA 92630
949/597-3191 949/597-3199

ccinceggs@aol.com

www.creativeconception.net

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lauria@lovingdonation.com

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Meridian ID 83680

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tiffany@nationwideeggdonation.com

www.nationwideeggdonation.com

Giving Hope Egg Donation

2000 E Kamay Drive

Meridian, ID 83646

208/884-0455 208/445-1000

katy@givinghopeinc.com

www.givinghopeinc.com

Illinois**Alternative Reproductive Resources**

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arrinfo@arr1.com

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Family Source Consultants LLC

1000 Essington Road

Reproductive Assistance, Inc.

PO Box 404

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www.reproductiveassistanceinc.com

Oklahoma**The Stork Society**

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Pennsylvania**Seeds Center**

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Prime Genetics LLC
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 Sugar Land TX 77479
 281/265-1403 281/499-8966

Elite Fertility Solutions

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Miracles for Families, Inc.

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Pacific Fertility Egg Donor Agency

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www.infertilitydoctor.com

Extraordinary Conceptions

1225 San Elijo Road

Massachusetts**Northeast Assisted Fertility Group, Inc.**

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 Boston MA 02109
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Circle Surrogacy

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amy.demma@prospectivefamilies.com
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Utah**Utah Center for Reproductive Medicine**

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Reproductive Care Center

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 Sandy UT 84092
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donoregocoordinator@fertilitydr.com
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Washington**Northwest Fertility Connection**

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Egg Donor Select, Inc.

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